

THE HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UTHERVERSE GAMING LLC,

Plaintiff,

v.

EPIC GAMES, INC.,

Defendant.

Case No. 2:21-cv-00799-RSM

**DECLARATION OF BRIAN BOYLE
IN SUPPORT OF DEFENDANT EPIC
GAMES, INC.'S MOTION TO SEAL
REGARDING MOTIONS IN LIMINE**

1 I, Brian Boyle, declare:

2 1. I am Vice President and Controller at Epic Games, Inc. ("Epic"). I submit this
3 declaration on behalf of Epic regarding Epic's Motion to Seal Regarding Motions in Limine. I
4 have personal knowledge of each fact stated in this declaration, to which I could and would
5 competently testify if called as a witness.

6 2. I have reviewed the portions of Epic's Motions in Limine that Epic seeks to seal.
7 Those portions consist of internal confidential Epic financial information concerning company-
8 wide revenues and *Fortnite*-wide revenues (including specific numbers from 2020 and 2022).

9 3. Epic is a privately held company and keeps the information it seeks to seal strictly
10 confidential. Epic's sensitive financial data is maintained in a secure document repository. Access
11 to this repository is restricted to authorized users with valid login credentials. To the extent that
12 Epic shares these sensitive financial data with individuals or organizations outside of Epic, it
13 requires that those individuals or organizations maintain the confidentiality of those data.

14 4. The disclosure of Epic's internal, strictly confidential financial data creates a
15 significant risk of harm to Epic. Competitors and potential business partners viewing this
16 information would gain an unfair advantage by gaining insight into Epic's overall financial
17 position and its financial position as it pertains to *Fortnite*.
18

19
20 I declare under penalty of perjury under the laws of the United States that the foregoing is
21 true and correct. Executed on 8/29/2024 in Cary, North Carolina.
22

23 DocuSigned by:
24 
25 Brian Boyle
26 7304212FB15749D...